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6 Attorneys for Defendants  
INTU CORPORATION and DEANNA EDWARDS

7  
8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF NEVADA**  
10

11 KRYSTAL JOHNSON, on behalf of herself  
and all others similarly situated, an individual;  
12 SHANNON DELELLE, on behalf of herself  
and all others similarly situated, an individual;  
13 CRYSTAL HONECK, on behalf of herself  
and all others similarly situated, an individual;  
14 DUSTY DANGERFIELD, on behalf of herself  
and all others similarly situated, an individual;  
15 JENNIFER WAKUZAWA-KIDA, on behalf  
of herself and all others similarly situated, an  
16 individual; SARAH PASCOE, on behalf of  
herself and all others similarly situated, an  
17 individual; ELIZABETH SPANGLER, on  
behalf of herself and all others similarly  
18 situated, an individual; SHANNON  
THOMPSON, on behalf of herself and all  
19 others similarly situated, an individual;

20 Plaintiffs,

21 v.

22 INTU, a Nevada corporation; DEANNA  
EDWARDS, an individual,

23 Defendants.  
24

Case No. 2:18-cv-02361-MMD-NJK

**OFFER OF JUDGMENT TO JENNIFER  
WAKUZAWA-KIDA**

25 Pursuant to Federal Rule of Civil Procedure 68 and Nevada Rule of Civil Procedure 68,  
26 Defendants Deanna Edwards and INTU Corporation hereby jointly offer to Plaintiff JENNIFER  
27 WAKUZAWA-KIDA (“Kida”), to allow entry of judgment to entered in favor of Kida in the total  
28 sum of One-Thousand Dollars (\$1,000.00). *See, MRO Communications, Inc. v. American Tel.*

1 & *Tel. Co.*, 194 F.3d 1276 (D. Nev. 1999) (holding that NRCP 68, awarding attorneys' fees to a  
2 defendant whose offer of judgment has been rejected applies in cases where a plaintiff has filed  
3 supplemental state law claims in federal court).

4 This offer of judgment is inclusive of all litigation costs, including expert costs, attorneys'  
5 fees, and interest that could be claimed by Kida in this action. This offer specifically precludes a  
6 separate award of costs pursuant to NRS 18.110, and NRCP 68(d)(3).

7 This Offer of Judgment is made for the sole purpose of settling and resolving this claim  
8 and cannot, and should not, be interpreted as an admission of liability or wrongdoing on the part of  
9 Defendants.

10 Pursuant to FRCP 68 and NRCP 68, this Offer of Judgment will remain open for fourteen  
11 (14) days from service, at which time it will be automatically revoked.

12  
13 DATED: July 29, 2019

PAYNE & FEARS LLP

14  
15 By: /s/ Sarah J. Odia

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21 and DEANNA EDWARDS  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2019, service of the foregoing, **OFFER OF JUDGMENT TO JENNIFER WAKUZAWA-KIDA** was made this date via Certified Mail to the last known address as follows:

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